

RE: Patterson v. Rawlings: Plaintiffs' Motion for Sanctions

Rodriguez, Stacy <stacy.rodriguez@dallascityhall.com>

Tue 10/31/2017 11:46 AM

Inbox

To: David Vandenberg <davidvandenberg@hotmail.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Penney, Lisa <Lisa.Penney@dallascityhall.com>; Walker, Yvonne <yvonne.walker@dallascityhall.com>; Estee, Charles <Charles.Estee@dallascityhall.com>;

Cckdl@slrc-csa.org <kdl@slrc-csa.org>;

We oppose the motion on the basis that it lacks merit.

From: David Vandenberg [mailto:davidvandenberg@hotmail.com]

Sent: Tuesday, October 31, 2017 9:20 AM

To: Rodriguez, Stacy <stacy.rodriguez@dallascityhall.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Penney, Lisa <Lisa.Penney@dallascityhall.com>; Walker, Yvonne <yvonne.walker@dallascityhall.com>; Estee, Charles <Charles.Estee@dallascityhall.com>

Cc: kdl@slrc-csa.org

Subject: Patterson v. Rawlings: Plaintiffs' Motion for Sanctions

Good morning,

We are preparing a motion for sanctions against y'all's clients and against y'all as attorneys for the clients for not obeying the court's scheduling order, multiplying the proceeding unreasonably and vexatiously, and to enforce the court's inherent authority to regulate its docket, promote judicial efficiency, and deter frivolous filings.

We assuredly do not like making such filings and request that you withdraw your briefs that the court did not order in its scheduling order. These are the Oct. 12 Response, ECF No. 21, and your Reply of Oct. 27, ECF No. 28.

Again, we do not like to make such motions, but we are responsible for fully advocating for our clients and to assist the Court in maintaining its docket efficiently.

We wish you the very best today and look forward to hearing from you as to whether you consent or object to this motion, or if you will promptly withdraw the disputed pleadings.

Cordially,

David D. Vandenberg, Esq.
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(512) 373-8694

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